

BEFORE THE STATE BOARD OF EQUALIZATION  
ASSESSMENT APPEALS COMMISSION

Appeal of:

HAROLD D. CLARK, ET UX	)	
Map 017-00-0, Parcel 362.00	)	Davidson
Residential Property	)	County
Tax Year 2005-2006	)	

FINAL DECISION AND ORDER

Statement of the case

This is an appeal by the taxpayer from the initial decision and order of the administrative judge who recommended the subject property be assessed as follows:

Land value	Improvement value	Total value	Assessment
\$29,700	\$215,400	\$245,100	\$61,275

The appeal was heard in Nashville on October 25, 2006 before Commission members Stokes (presiding), Gilliam and White.<sup>1</sup> Mr. Clark represented himself, and staff appraiser Beth Heathcott appeared on behalf of the assessor. By agreement of the parties, the appeal is amended to include tax year 2006 as well as 2005.

Findings of fact and conclusions of law

The subject property is a single family residence located at 6216 Lickton Pike in Goodlettsville. Mr. Clark contended the property should be valued no higher than \$225,000, which is his cost to build plus the price he paid for the land in 2003.

Ms. Heathcott presented her analysis of comparable sales indicating a value of \$261,000, but she stated the assessor did not seek an increase beyond the present appraised value of \$245,100.

Mr. Clark has advanced an argument that we have rejected previously, to wit, that property built by an owner serving as his own general contractor is worth no more than the owner/contractor's cost. It is unlikely the typical owner would part with his property at cost, of course, and the selling price of new homes typically reflects the builder's reasonable profit as well as the cost of labor and materials. Mr. Clark has accordingly not shown the initial decision and order to be in error, and we find it should be affirmed.

ORDER

<sup>1</sup> Mr. Gilliam sat as a designated alternate for an absent member, pursuant to Tenn. Code Ann. §4-5-302.

It is therefore ORDERED, that the initial decision and order of the administrative judge is affirmed and the assessment of the subject property is determined as follows for tax years 2005 and 2006:

Land value	Improvement value	Total value	Assessment
\$29,700	\$215,400	\$245,100	\$61,275

. This order is subject to:

1. Reconsideration by the Commission, in the Commission's discretion.


Reconsideration must be requested in writing, stating specific grounds for relief and the request must be filed with the Executive Secretary of the State Board within fifteen (15) days from the date of this order.

2. Review by the State Board of Equalization, in the Board's discretion. This review must be requested in writing, state specific grounds for relief, and be filed with the Executive Secretary of the State Board within thirty (30) days from the date of this order.

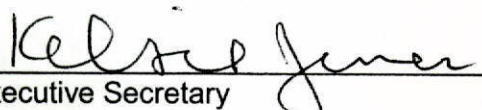
3. Review by the Chancery Court of Davidson County. A petition must be filed within sixty (60) days from the date of the official assessment certificate which will be issued when this matter has become final.

Requests for stay of effectiveness will not be accepted.

DATED: 12-19-06

  
\_\_\_\_\_  
Presiding member

ATTEST:

  
\_\_\_\_\_  
Executive Secretary

cc: Mr. Harold Clark  
Ms. Jo Ann North, Assessor